

United States Courts
Southern District of Texas
FILED

April 04, 2019

David J. Bradley, Clerk of Court

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

PAUL ROOSEVELT BANKS III (1)
JOHN FELTON BOUTTE, JR. (2)
DAVID BENFORD DORSEY (3)
KEITH DEWAYNE DORSEY (4)
KEVIN DEWAYNE HARRIS (5)
JESSE BANKS MOTTON, JR. (6)
CHARLES JERMAINE RANDLE (7)
GEORGE SHERMAN BECKS (8)
MARQUETT CAINS DORSEY (9)
PATRICK RENOID SMITH (10)
BRANDON JAMAL PINSON (11)
TRACY ONEAL BLUNT, JR. (12)
CYRUS RAY MCQUARN (13)
DEANDRE MARKER ADAMS (14)
LESLIE JAMES ADAMS (15)
TYRONE CHRISTOPHER GOREE (16)
LORIE ANITA MONTGOMERY (17)
MAJEL D. MAPP (18)
LATRELL RAYSHOD PHILLIPS (19)
DARIUS MARQUISE CELESTINE (20)
ALLEN JOSEPH LANCELIN (21)
RONALD WAYNE KING (22)
OLIVER MAVERICK ARRINGTON (23)
MARSHALL LEE WARE, JR. (24)
JEROLD JERMAINE FREEMAN (25)
GILLETTE ANDREW TOLIVER, III (26)
ANDREA LO RETTE STANLEY (27)

SEALED

No. 4:18CR131
Judge Crone

4:19MJ582

UNSEALED Per Order

FILED

FEB - 6 2019

Clerk, U.S. District Court
Texas Eastern

THIRD SUPERSEDING INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 18 U.S.C. §§ 1951 and 2
(Conspiracy to Interfere with Interstate
Commerce by Robbery, Aiding and
Abetting)

THE CONSPIRACY

From on or about August 1, 2017, and continuing through on or about January 9, 2019, in the Eastern District of Texas and elsewhere, **Paul Roosevelt Banks III, John Felton Boutte, Jr., David Benford Dorsey, Keith Dewayne Dorsey, Kevin Dewayne Harris, Jesse Banks Motton, Jr., Charles Jermaine Randle, George Sherman Becks, Marquett Cains Dorsey, Patrick Renoid Smith, Brandon Jamal Pinson, Tracy Oneal Blunt, Jr., Cyrus Ray McQuarn, Deandre Marker Adams, Leslie James Adams, Tyrone Christopher Goree, Lorie Anita Montgomery, Majel D. Mapp, Latrell Rayshod Phillips, Darius Marquise Celestine, Allen Joseph Lancelin, Ronald Wayne King, Oliver Maverick Arrington, Marshall Lee Ware, Jr., Jerold Jermaine Freeman, Gillette Andrew Toliver, III, and Andrea Lo Rette Stanley**, the defendants, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together and with each other, and with others known and unknown to the Grand Jury, to commit a certain offense against the United States, to wit: interference with commerce by robbery, in violation of 18 U.S.C. §§1951 and 2.

OBJECT OF THE CONSPIRACY

The object of the conspiracy was to unlawfully take and obtain personal property, consisting of United States currency, from the persons and in the presence of employees, owners, and agents of businesses against their will by means of actual and threatened force, violence, and fear of immediate injury to their persons and property.

MANNER AND MEANS

1. It was part of the conspiracy that **Paul Roosevelt Banks III, John Felton Boutte, Jr., David Benford Dorsey, Keith Dewayne Dorsey, Kevin Dewayne Harris, Jesse Banks Motton, Jr., Charles Jermaine Randle, George Sherman Becks, Marquett Cains Dorsey, Patrick Renoid Smith, Brandon Jamal Pinson, Tracy Oneal Blunt, Jr., Cyrus Ray McQuarn, Deandre Marker Adams, Leslie James Adams, Tyrone Christopher Goree, Lorie Anita Montgomery, Majel D. Mapp, Latrell Rayshod Phillips, Darius Marquise Celestine, Allen Joseph Lancelin, Ronald Wayne King, Oliver Maverick Arrington, Marshall Lee Ware, Jr., Jerold Jermaine Freeman, Gillette Andrew Toliver, III, and Andrea Lo Rette Stanley**, the defendants, and other persons known and unknown to the Grand Jury, discussed and planned with each other, among other things, one or more of the following robberies (loss amounts are estimated or approximate):

#	Date	Federal District	Bank/Vendor	City	State	Loss Amount	Victim
1	7/22/2017	SDTX	Chase/NCR	Houston	Texas	\$20,000	NCR
2	8/25/2017	SDTX	Chase/NCR	Houston	Texas	\$80,000	NCR

3	9/7/2017	SDTX	Chase/NCR	Houston	Texas	\$0	NCR
4	9/15/2017	SDTX	BOA/Garda	Houston	Texas	\$79,920	
5	9/25/2017	SDTX	BOA/NCR	Houston	Texas	\$77,380	BOA
6	9/28/2017	SDTX	Wells Fargo/NCR	Houston	Texas	\$0	Wells Fargo
7	9/30/2017	SDTX	Wells Fargo/NCR	Houston	Texas	\$39,940	Wells Fargo
8	10/2/2017	SDTX	BOA/NCR	Houston	Texas	\$39,900	BOA
9	10/5/2017	SDTX	Chase/NCR	Houston	Texas	\$60,000	NCR
10	10/9/2017	SDTX	Chase/Burroughs	Houston	Texas	\$0	
11	10/12/2017	SDTX	BOA/Diebold	Houston	Texas	\$0	BOA
12	10/13/2017	SDTX	BOA/NCR	Houston	Texas	\$29,500	NCR
13	10/17/2017	WDTX	Wells Fargo/NCR	Austin	Texas	\$96,807	Wells Fargo
14	10/19/2017	SDTX	BBVA/Diebold	Lake Jackson	Texas	\$62,320	BBVA
15	10/23/2017	SDTX	BOA/NCR	Houston	Texas	\$40,000	
16	10/24/2017	SDTX	Bank of America (Arrest)	Houston	Texas	\$109,220	BOA
17	11/10/2017	SDTX	Chase/Hyosung	Sugarland	Texas	\$10,072	
18	11/10/2017	NDTX	BOA/Diebold	Dallas	Texas	\$99,440	BOA
19	11/16/2017	WDTX	Wells Fargo/Diebold	Selma	Texas	\$188,870	Wells Fargo
20	12/1/2017	NDTX	Wells Fargo/NCR	Garland	Texas	\$47,950	Wells Fargo
21	12/7/2017	NDTX	BOA/NCR	Garland	Texas	\$159,730	BOA
22	12/9/2017	WDTX	BOA/NCR	San Antonio	Texas	\$41,940	BOA
23	12/19/2017	WDTX	Chase/NCR	San Antonio	Texas	\$95,140	NCR
24	12/20/2017	WDTX	Attempt	Austin	Texas	Attempt	None
25	12/29/2017	WDTX	Wells Fargo/NCR	Harker Heights	Texas	\$141,780	Wells Fargo
26	1/3/2018	WDTX	Chase (Arrest)	Austin	Texas	Arrest	None
27	1/3/2018	WDTX	BOA/Diebold	San Antonio	Texas	\$109,000	BOA
28	1/18/2018	EDTX	BOA/NCR	Allen	Texas	\$53,020	BOA
29	1/23/2018	SDTX	Wells Fargo/NCR	Houston	Texas	\$0	Wells Fargo
30	1/29/2018	EDTX	Wells Fargo/NCR	McKinney	Texas	\$67,150	Wells Fargo
31	1/30/2018	NDGA	Wells Fargo/NCR	Decatur	Georgia	\$103,640	Wells Fargo
32	2/6/2018	SDTX	Chase/NCR	Laredo	Texas	\$88,220	NCR

33	3/8/2018	WDNC	Wells Fargo/NCR	Mooreville	North Carolina	\$213,930	Wells Fargo
34	3/29/2018	NDGA	Wells Fargo	Conyers	Georgia	\$120,076	Wells Fargo
35	5/2/2018	WDMO	US Bank/Diebold	Blue Springs	Missouri	\$105,170	Diebold
36	5/8/2018	NDGA	BOA/Diebold	Atlanta	Georgia	\$88,000	BOA
37	5/9/2018	WDTN	Wells Fargo/NCR	Memphis	TN	\$109,020	Wells Fargo
38	6/1/2018	WDAR	Regions Bank/NCR	Nashville	Arkansas	\$63,480	Regions Bank
39	6/7/2018	WDTX	BOA/NCR	San Antonio	Texas	\$72,420	BOA
40	7/19/2018	CDMO	BOA/Diebold	St. Louis	Missouri	\$68,560	BOA
41	7/31/2018	SDTX	Amegy/Diebold	Houston	Texas	\$17,260	Diebold
42	8/2/2018	EDTX	BOA/NCR	Plano	Texas	\$120,427	BOA
43	8/9/2018	NDIL	Chase/NCR	Norridge	Illinois	\$100,780	NCR
44	8/14/2018	EDTX	Capital One/NCR	Texarkana	Texas	\$70,855	Capital One
45	9/13/2018	NDTX	BB&T/NCR	Dallas	Texas	\$34,903	BB&T
46	10/8/2018	MDFL	Chase/NCR	Orlando	Florida	\$33,620	NCR
47	10/26/2018	CDMO	Reliance Bank/NCR (Attempt/Arrest)	St. Louis	Missouri	\$17,130	None
Estimated/Approximate Total						\$2,779,430	

At all times during the course and scope of the conspiracy, the above-mentioned businesses conducted business in interstate commerce, and the conspiracy would have, and did, in any way or degree, obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce as contemplated by 18 U.S.C. §1951.

2. It was further part of the conspiracy that the defendants and others known and unknown to the Grand Jury formulated a plan and agreement, which, among other things, included:

a. the acquisition of United States currency;

- b. the acquisition of property for use in committing robbery;
- c. the timing and means of transportation to commit robbery;
- d. the roles of participation during the preparation for and commission of robbery;
- e. plans to avoid detection and apprehension by law enforcement.

OVERT ACTS OF THE CONSPIRACY

To effect the object of the conspiracy, **Paul Roosevelt Banks III, John Felton Boutte, Jr., David Benford Dorsey, Keith Dewayne Dorsey, Kevin Dewayne Harris, Jesse Banks Motton, Jr., Charles Jermaine Randle, George Sherman Becks, Marquett Cains Dorsey, Patrick Renoid Smith, Brandon Jamal Pinson, Tracy Oneal Blunt, Jr., Cyrus Ray McQuarn, Deandre Marker Adams, Leslie James Adams, Tyrone Christopher Goree, Lorie Anita Montgomery, Majel D. Mapp, Latrell Rayshod Phillips, Darius Marquise Celestine, Allen Joseph Lancelin, Ronald Wayne King, Oliver Maverick Arrington, Marshall Lee Ware, Jr., Jerold Jermaine Freeman, Gillette Andrew Toliver, III, and Andrea Lo Rette Stanley**, the defendants, and other persons known and unknown to the Grand Jury, committed overt acts within the Eastern District of Texas, and elsewhere, including, but not limited to, the following:

1. On or about January 18, 2018, in Allen, Texas, Eastern District of Texas, **Paul Roosevelt Banks III, Tracy Oneal Blunt, Jr., John Felton Boutte, Jr., David Benford Dorsey, Jesse Banks Motton, Charles Jermaine Randle**, and other persons known and unknown to the Grand Jury, aided and abetted by each other took personal

property consisting of United States currency from the person and in the presence of an employee and agent of National Cash Register (NCR), against his will, by means of actual or threatened force, violence, and fear of injury to his person.

2. On or about January 29, 2018, in McKinney, Texas, Eastern District of Texas, **Paul Roosevelt Banks III, Tracy Oneal Blunt, Jr., John Felton Boutte, Jr., David Benford Dorsey, Jesse Banks Motton, Jr., Charles Jermaine Randle** and other persons known and unknown to the Grand Jury, aided and abetted by each other took personal property consisting of United States currency from the person and in the presence of an employee and agent of National Cash Register (NCR), against his will, by means of actual or threatened force, violence, and fear of injury to his person.

3. On or about February 6, 2018, in Laredo, Texas, Southern District of Texas, **Paul Roosevelt Banks III, John Felton Boutte, Jr., David Benford Dorsey, Kevin Dewayne Harris, Jesse Banks Motton, Jr., Charles Jermaine Randle** and other persons known and unknown to the Grand Jury, aided and abetted by each other took personal property consisting of United States currency from the person and in the presence of an employee and agent of National Cash Register (NCR), against his will, by means of actual or threatened force, violence, and fear of injury to his person.

4. On or about August 2, 2018, in Plano, Texas, Eastern District of Texas, **Paul Roosevelt Banks III, George Sherman Becks, Tracy Oneal Blunt, Jr., John Felton Boutte, Jr., David Benford Dorsey, Keith Dewayne Dorsey** and other persons known and unknown to the Grand Jury, aided and abetted each other took personal

property consisting of United States currency from the person and in the presence of an employee and agent of National Cash Register (NCR), against his will, by means of actual or threatened force, violence, and fear of injury to his person.

5. On or about August 14, 2018, in Texarkana, Texas, Eastern District of Texas, **Keith Dewayne Dorsey, George Sherman Becks, Marquett Cains Dorsey** and other persons known and unknown to the Grand Jury, aided and abetted by each other took personal property consisting of United States currency from the person and in the presence of an employee and agent of National Cash Register (NCR), against his will, by means of actual or threatened force, violence, and fear of injury to his person.

All in violation of 18 U.S.C. §§1951 and 2.

Count Two

Violation: 18 U.S.C. §§ 1951(a) and 2
(Interference with Interstate Commerce
by Robbery and Aiding and Abetting)

On or about January 18, 2018, in Allen, Texas, Eastern District of Texas, **Paul Roosevelt Banks III, Tracy Oneal Blunt, Jr., John Felton Boutte, Jr., David Benford Dorsey, Jesse Banks Motton, and Charles Jermaine Randle**, the defendants, aided and abetted by each other, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay and affect, commerce, as that term is defined in 18 U.S.C. § 1951, in that the defendants, aiding and abetting each other, did unlawfully take, obtain, and attempt to take and obtain personal property consisting of United States currency from the person

and in the presence of an employee and agent of National Cash Register (NCR), against his will, by means of actual or threatened force, violence, and fear of injury to his person.

In violation of 18 U.S.C. §§ 1951(a) and 2.

Count Three

Violation: 18 U.S.C. §§ 1951(a) and 2
(Interference with Interstate Commerce
by Robbery and Aiding and Abetting)

On or about January 29, 2018, in McKinney, Texas, Eastern District of Texas, **Paul Roosevelt Banks III, Tracy Oneal Blunt, Jr., John Felton Boutte, Jr., David Benford Dorsey, Jesse Banks Motton, Jr., and Charles Jermaine Randle**, the defendants, aided and abetted by each other, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect commerce, as that term is defined in 18 U.S.C. § 1951, in that the defendants, aiding and abetting each other, did unlawfully take, obtain, and attempt to take and obtain personal property consisting of United States currency from the person and in the presence of an employee and agent of National Cash Register (NCR), against his will, by means of actual or threatened force, violence, and fear of injury to his person.

In violation of 18 U.S.C. §§ 1951(a) and 2.

Count Four

Violation: 18 U.S.C. §§ 1951(a) and 2
(Interference with Interstate Commerce
by Robbery and Aiding and Abetting)

On or about August 2, 2018, in Plano, Texas, Eastern District of Texas, **Paul Roosevelt Banks III, George Sherman Becks, Tracy Oneal Blunt, Jr., John Felton Boutte, Jr., David Benford Dorsey, and Keith Dewayne Dorsey**, the defendants, aided and abetted by each other, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect commerce, as that term is defined in 18 U.S.C. § 1951, in that the defendants, aiding and abetting each other, did unlawfully take, obtain, and attempt to take and obtain personal property consisting of United States currency from the person and in the presence of an employee and agent of National Cash Register (NCR), against his will, by means of actual or threatened force, violence, and fear of injury to his person.

In violation of 18 U.S.C. §§ 1951(a) and 2.

Count Five

Violation: 18 U.S.C. §§ 1951(a) and 2
(Interference with Interstate Commerce
by Robbery and Aiding and Abetting)

On or about August 14, 2018, in Texarkana, Texas, Eastern District of Texas, **Keith Dewayne Dorsey, George Sherman Becks, and Marquett Cains Dorsey**, the defendants, aided and abetted by each other, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect commerce, as that term is defined in 18 U.S.C. § 1951, in that the defendants, aiding and abetting each other, did unlawfully take, obtain, and attempt to take and obtain personal property consisting of United States currency from the person and in the presence of an employee and agent of National Cash Register

(NCR), against his will, by means of actual or threatened force, violence, and fear of injury to his person.

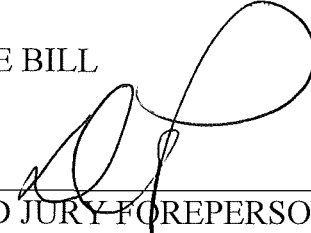
In violation of 18 U.S.C. §§ 1951(a) and 2.

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

As a result of committing the offense charged in this Third Superseding Indictment, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property used to commit or facilitate the offenses, proceeds from the offenses, and property derived from proceeds obtained directly or indirectly from the offenses, including but not limited to the following:


All such proceeds and/or instrumentalities are subject to forfeiture by the government.

A TRUE BILL



GRAND JURY FOREPERSON

JOSEPH D. BROWN
UNITED STATES ATTORNEY



ERNEST GONZALEZ
Assistant United States Attorney

2-6-19

Date

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

PAUL ROOSEVELT BANKS III (1)
JOHN FELTON BOUTTE, JR. (2)
DAVID BENFORD DORSEY (3)
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SEALED

No. 4:18CR131

Judge Crone

FILED

FEB - 6 2019

Clerk, U.S. District Court
Texas Eastern

NOTICE OF PENALTY

Counts One thru Five

Violation: 18 U.S.C. §§1951 and 2

Penalty: Imprisonment for a term of not more than twenty years; a fine not to exceed \$250,000.00; or twice the gross pecuniary gain to the defendant or twice the gross pecuniary loss to the victim, whichever is greatest; and supervised release of not more than three years.

Special Assessment: \$100.00

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the
Eastern District of TexasUnited States of America
v.

JEROLD JERMAINE FREEMAN (25)

Defendant

Case No. 4:18-cr-131 (MAC)

4:19MJ582

SEALED

2019 FEB -03 PM 2:29

RECEIVED
CLERK OF COURT
SHERMAN

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) JEROLD JERMAINE FREEMAN

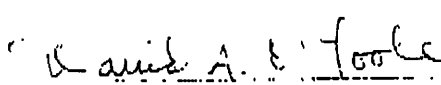
who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment ☒ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

18U.S.C. §§ 1951 and 2 (Conspiracy to Interfere with Interstate Commerce by Robbery, Aiding and Abetting)

Date: 02/06/2019

City and state: Sherman, TX

 Issuing officer's signature
David A. O'Toole, Clerk
Printed name and title

Return

This warrant was received on (date)
at (city and state)

, and the person was arrested on (date)

Date:

Arresting officer's signature

Printed name and title